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CLERK OF DISTRICT COURT

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

January 2016 Grand Jury

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.

[REDACTED]

WONG HUNG NG (6),  
aka "Mau,"  
GILBERTO GERARDO  
VILLALOBOS ZAMORA (7),  
aka "Lic,"

Defendants.

The grand jury charges:

Case No. 16CR1996-WQH

I N D I C T M E N T  
(2nd Superseding)

Title 21, U.S.C., Secs. 959, 960 and 963 - International Conspiracy to Distribute Controlled Substances; Title 21, U.S.C., Secs. 959, 960 - International Distribution of Controlled Substances; Title 21, U.S.C., Secs. 841(a)(1) and 846 - Conspiracy to Distribute Controlled Substances; Title 18, U.S.C., Sec. 1956(a)(1)(B)(i), (a)(2)(B)(i) and (h) - Conspiracy to Launder Monetary Instruments; Title 21, U.S.C., Sec. 853 and Title 18, U.S.C., Sec. 982 - Criminal Forfeiture

I hereby attest and certify that the foregoing is a true and correct copy of the original indictment and in my legal custody.

CLERK OF DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

By M. LOZANO Deputy



Count 3

In or about March 2016, in the country of Mexico and elsewhere, defendants [REDACTED] [REDACTED] [REDACTED] who will first enter the United States within the Southern District of California, did knowingly and intentionally distribute and cause the distribution of 5 kilograms and more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, intending and knowing that such cocaine would be unlawfully imported into the United States; in violation of Title 21, United States Code, Sections 959 and 960.

Count 4

In or about May 2016, in the country of Nicaragua and elsewhere, defendants [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED], WONG HUNG NG, aka "Mau," and GILBERTO GERARDO VILLALOBOS ZAMORA, aka "Lic," who will first enter the United States within the Southern District of California, did knowingly and intentionally distribute and cause the distribution of 5 kilograms and more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, intending and knowing that such cocaine would be unlawfully imported into the United States; in violation of Title 21, United States Code, Sections 959 and 960.

Count 5

Beginning at a date unknown to the grand jury and continuing up to and including January 2017, within the Southern District of California and elsewhere, defendants [REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED], WONG HUNG NG, aka "Mau," and GILBERTO

GERARDO VILLALOBOS ZAMORA, aka "Lic," did knowingly and intentionally conspire together and with each other and with others known and unknown to the grand jury to possess with intent to distribute and to distribute a controlled substance, to wit: 5 kilograms and more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance; all in violation of Title 21 United States Code, Sections 841(a)(1) and 846.

Count 6

Beginning at a date unknown to the grand jury and continuing up to and including January 2017, within the Southern District of California and elsewhere, defendants [REDACTED] [REDACTED] [REDACTED].

WONG HUNG NG, aka "Mau," and GILBERTO GERARDO VILLALOBOS ZAMORA, aka "Lic," did knowingly combine, conspire, and agree with each other and with other persons known and unknown to the grand jury to commit offenses against the United States, to wit: to knowingly conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, Conspiracy to Possess With Intent to Distribute and to Distribute Controlled Substances in violation of Title 21, United States Code, Sections 841(a)(1) and 846, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and to transport, transmit, and transfer, a

monetary instrument and funds involving the proceeds of specified unlawful activity, that is, Conspiracy to Possess With Intent to Distribute and to Distribute Controlled Substances in violation of Title 21, United States Code, Sections 841(a)(1) and 846, from a place in the United States to and through a place outside the United States, knowing that the funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i); all in violation of Title 18, United States Code, Section 1956(h).

## Criminal Forfeiture Allegations

1. The allegations contained in Counts 1 through 6 are realleged and by their reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 21, United States Code, Section 853 and Title 18, United States Code, Section 982.

2. As a result of the commission of the felony offenses alleged in Counts 1 through 5 of this 2<sup>nd</sup> superseding indictment, said violations being punishable by imprisonment for more than one year and pursuant to Title 21, United States Code, Sections 853(a)(1) and 853(a)(2),

defendants [REDACTED] [REDACTED] [REDACTED]

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\_\_\_\_\_

WONG HUNG NG, aka "Mau," and GILBERTO GERARDO

VILLALOBOS ZAMORA, aka "Lic," shall, upon conviction, forfeit to the

1 United States all their rights, title and interest in any and all  
 2 property constituting, or derived from, any proceeds the defendants  
 3 obtained, directly or indirectly, as the result of the offenses, and any  
 4 and all property used or intended to be used in any manner or part to  
 5 commit and to facilitate the commission of the violations alleged in  
 6 this 2<sup>nd</sup> superseding indictment.

7 3. Upon conviction of the offense set forth in Count 6, defendants

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED] WONG HUNG NG, aka "Mau," and GILBERTO GERARDO VILLALOBOS ZAMORA,  
 12 aka "Lic," shall forfeit to the United States, all property, real and  
 13 personal, involved in such offense, and all property traceable to such  
 14 property.

15 4. If any of the above referenced forfeitable property, as a  
 16 result of any act or omission of the defendants:

- 17 a. cannot be located upon the exercise of due diligence;
- 18 b. has been transferred or sold to, or deposited with, a third
- 19 party;
- 20 c. has been placed beyond the jurisdiction of the Court;
- 21 d. has been substantially diminished in value; or
- 22 e. has been commingled with other property which cannot be
- 23 subdivided without difficulty;

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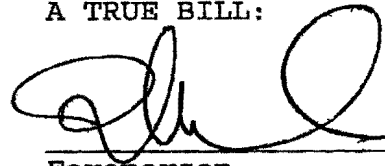
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1 it is the intent of the United States, pursuant to Title 21, United  
2 States Code, Section 853(p), to seek forfeiture of any other property  
3 of the defendants up to the value of the said property listed above as  
4 being subject to forfeiture.

5 All in violation of Title 21, United States Code, Section 853 and  
6 Title 18, United States Code, Section 982.

7 DATED: January 12, 2017.

8 A TRUE BILL:

9  
10 

Foreperson

11 ALANA W. ROBINSON  
12 Acting United States Attorney

13  
14 By: 

JOSHUA P. JONES  
15 Assistant U.S. Attorney